

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

JOHN DOE,

Plaintiff,

vs.

No. 5:19-CV-1467 (TJM/ATB)

SYRACUSE UNIVERSITY, KENT SYVERUD,
individually and as an agent for Syracuse University,
PAMELA PETER, individually and as an agent for
Syracuse University, **SHEILA JOHNSON-WILLIS,**
individually and as an agent for Syracuse University,
AND BERNERD JACOBSON, individually and as an
agent for Syracuse University,

Defendants

**DEFENDANTS' NOTICE OF
MOTION TO DISMISS**

Oral Argument Requested

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, and the Exhibits annexed thereto, Defendants Syracuse University, Kent Syverud, Pamela Peter, Sheila Johnson-Willis, and Bernerd Jacobson, will move this Court before the Honorable Thomas J. McAvoy at the James T. Foley U.S. Courthouse, 445 Broadway, Albany, New York on April 13, 2020 at 10:00 AM, for an Order, pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing with prejudice all claims asserted by Plaintiff John Doe for failure to state a claim upon which relief can be granted.

PLEASE TAKE FURTHER NOTICE that Defendants intend to file and serve Reply papers, and request the opportunity to orally argue this motion.

Dated: February 10, 2020

Respectfully submitted:

/s/ David W. DeBruin

David W. DeBruin (*pro hac vice*)
Ishan K. Bhabha (*pro hac vice*)
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2020, I electronically filed the foregoing with the Clerk of Court, to be served on all parties of record via the CM/ECF system.

By: /s/ David W. DeBruin
David W. DeBruin